



United States Department of Justice

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Northern District of New York*

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July 18, 2022

Hon. Mae A. D'Agostino
United States District Court Judge
Northern District of New York
James T. Foley Federal Courthouse
445 Broadway
Albany, New York 12207

Re: Post Trial Motions in *United States v. Xiaoqing Zheng*
19-CR-156 (MAD)

Dear Judge D'Agostino,

On June 29, 2022 the defense filed its post-trial motions. Dkt. No. 277. The defense's motions raise some novel arguments which are requiring some additional legal research by the government. Consequently, the government respectfully requests that its motion response date, currently set for July 20, 2022, be extended by two weeks to August 3, 2022.

Thank you.

Very truly yours,

CARLA B. FREEDMAN
United States Attorney

By: /s/ Richard Belliss
Richard D. Belliss
Assistant U.S. Attorney

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(via ecf)

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